

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S RESPONSE TO
NECC, INSIDERS, AND AFFILIATED DEFENDANTS'
MOTIONS FOR PROTECTIVE ORDERS [DKT. NOS. 1810, 1823, 1824, 1826]**

The PSC takes no position on the motions for protective orders seeking to prevent depositions of NECC, insiders, and affiliated defendants from going forward.¹ We file this response to make two simple points:

First, these expected discovery disputes should not derail an expedited trial schedule. Our goal remains an expedited trial by the end of this year (as will be addressed in the PSC's submission on bellwether process, to be filed by May 18, 2015, in accordance with Case Management Order No. 9).

Second, if the depositions of NECC, insiders, and affiliated defendants do go forward, the PSC expects that it will need about half the total deposition time for each deponent. We have advised all parties, in advance, about this expectation and will address this with defendants on a deposition-by-deposition basis.

¹ Chapter 11 Trustee's Motion Pursuant to Fed. R. Civ. P. 26(c) and 45(c) precluding the Tennessee Clinic Defendants from Conducting a Deposition of New England Compounding Pharmacy, Inc. [Dkt. 1810]; Barry J Cadden, Lisa Conigliaro Cadden, Glenn Chin, Carla Conigliaro, Douglas Conigliaro, Greg Conigliaro's Motion for Protective Order [Dkt. 1823]; Ameridose's Motion for Joinder in Motion for a Protective Order Filed by Certain Individual Defendants [Dkt. 1824]; and GDC's Motion for Joinder in the Motion for Protective Order filed by Certain Individual Defendants [Dkt. 1826].

Dated: May 12, 2015

Respectfully submitted,

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the above to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: May 12, 2015

/s/ Kristen A. Johnson
Thomas M. Sobol, BBO # 667261